

**ANDERSEN LAW FIRM, LTD.**

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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

Rock N' Roll Foods, LLC; Richard "Rocky"  
Parks,

Plaintiffs,

v.

Stephen Frazer; Emerging Technology  
Corporation; et al.,

Defendants.

Case No. 2:15-cv-00988-JAD-DJA

**MOTION AND ~~PROPOSED~~ ORDER TO  
WITHDRAW AS COUNSEL OF RECORD**

RYAN A. ANDERSEN, ESQ., respectfully moves this court for an order permitting RYAN A. ANDERSEN, ESQ. ("Mr. Andersen") who has appeared in these proceedings, to withdraw as counsel for Plaintiffs, ROCK N' ROLL FOODS, LLC and RICHARD "ROCKY" PARKS ("Plaintiffs"), in the above captioned matter, pursuant to Local Rule IA 10-6, S.C.R 46, and N.R.C.P. 1.16(b)(1) and (7).

This Motion is made and based upon the following Memorandum of Points and Authorities submitted herein, the Declaration of Ryan A. Andersen, Esq., the pleadings and papers on file herein, and any argument at the hearing of this Motion to Withdraw as Counsel of Record.

Dated this 11th day of October, 2023.

Respectfully submitted by:

**ANDERSEN LAW FIRM, LTD.**

By: /s/ Ryan A. Andersen  
Ryan A. Andersen, Esq.  
Nevada Bar No. 12321  
3199 E Warm Springs Road, Suite 400  
Las Vegas, Nevada 89120



**DECLARATION**

I, RYAN A. ANDERSEN, ESQ., declare under penalty of perjury, that the following is true and correct:

1. I am an attorney at law admitted to practice in all courts of the State of Nevada. I have personal knowledge of the facts set forth below and I believe them to be true. I am over eighteen years old, and I am competent to testify to the matters set forth herein.

2. I represented, ROCK N' ROLL FOODS, LLC and RICHARD "ROCKY" PARKS, in the capacity of attorney, in the above referenced matter from filing date of my substitution of attorney on until shortly after the case closed a little over six years ago.

3. I currently do not represent ROCK N' ROLL FOODS, LLC and RICHARD "ROCKY" PARKS, as counsel or in any capacity, on any pending matters before this Court.

Dated this 11th day of October, 2023

**ANDERSEN LAW FIRM, LTD.**

/s/ Ryan A. Andersen

RYAN A. ANDERSEN, ESQ.

Nevada Bar No. 12321

3199 E Warm Springs Road. Suite 400

Las Vegas, NV 89120

**MEMORANDUM OF POINTS AND AUTHORITIES**

Mr. Andersen's representation of the Plaintiffs came to an end shortly after this case closed a little over six years ago. As such, undersigned counsel no longer represents the Plaintiffs in any capacity. The Local Rule IA 10-6(a) provides that "No attorney may withdraw after appearing in a case except by leave of court after notice served on the affected client and opposing counsel." The Plaintiffs and opposing parties in this case will receive notice of this Motion to Withdraw, pursuant to the Certificate of Service herein.

Additionally, Local Rule IA 10-6(e) provides that "no withdrawal... shall be approved if delay of discovery, the trial, or any hearing in the case would result." Here, no delay of any kind will result from Mr. Andersen's withdrawal because Plaintiffs' judgment has been entered and this case closed a

1 little over six years ago. Thus, Mr. Andersen's withdrawal will not prejudice any party or delay any  
 2 proceeding in this matter.

### 3 CONCLUSION

4 For the reasons set forth above, Mr. Andersen respectfully moves this Court to enter an Order  
 5 Approving the withdrawal of Mr. Andersen as attorney for ROCK N' ROLL FOODS, LLC and  
 6 RICHARD "ROCKY" PARKS in the instant matter.  
 7

8 Date this 11th day of October, 2023.

**ANDERSEN LAW FIRM, LTD.**

/s/ Ryan A. Andersen

RYAN A. ANDERSEN, ESQ.

Nevada Bar No. 12321

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Las Vegas, NV 89120

### 12 CERTIFICATE OF SERVICE

13 Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that on this 11th day of  
 14 October, 2023, I caused the MOTION AND PROPOSED ORDER TO WITHDRAW AS COUNSEL  
 15 OF RECORD and the DECLARATION OF RYAN A. ANDERSEN, ESQ., IN SUPPORT OF THE  
 16 MOTION TO WITHDRAW AS COUNSEL OF RECORD to be served by the Court's CM/ECF  
 17 system. The above-named documents were also served to the following via U.S. Regular Mail:  
 18

19 Richard "Rock" Parks  
 20 2766 Duneville St  
 Las Vegas, NV 89146

Rock N' Roll Foods, LLC  
 2766 Duneville St  
 Las Vegas, NV 89146

/s/ Melissa Rodriguez

Melissa Rodriguez, an employee  
 of Andersen Law Firm, Ltd.

24 **IT IS SO ORDERED.**

26 Dated: 10/18/2023  
 27 \_\_\_\_\_

  
 UNITED STATES MAGISTRATE JUDGE